

January 26, 2022

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Honorable Michael E. Wiles
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Request for Status Conference Pursuant to LBR 9076-1

Re: **In re: Greensill Capital Inc., Case No. 21-10561 (MEW)**

Dear Judge Wiles:

We represent the Greensill U.S. Liquidation Trust (the “Trust”) formed pursuant to the confirmed Second Amended Chapter 11 Plan of Liquidation for Greensill Capital Inc. [Docket No. 311] (the “Plan”) filed by Greensill Capital Inc. (the “U.S. Debtor”). This is a request for a status conference pursuant to LBR 9076-1 to address the turnover of the Debtor’s own documents and information in the possession and control of Greensill Capital Management (UK) Limited and Greensill Capital (UK) Limited (collectively, “GCUK”) that has been the subject of outstanding requests since November 2021.¹

Although there have been collegial discussions and some cooperation, GCUK has not turned over documents and information such as bank statements, employee records, employee emails, and other requested items required to investigate, analyze and reconcile claims. A prompt resolution of this impasse is necessary given that – as GCUK is aware – the Claims Objection Deadline is approaching. Delay in turning over the U.S. Debtor’s documents and information has a domino effect of delaying the Trust’s timeline to take other action, inevitably leading to increased costs and prejudice to the Trust and its beneficiaries.

¹ At the October 26, 2021 confirmation hearing, counsel for the Committee raised the issue of securing a commitment from GCUK on timely turnover of this information. Your Honor unequivocally stated: “It’s often the case that the parent entity actually maintains some of the Debtors’ records or the subsidiaries’ records. The parent may actually maintain the computerized general ledger and subledgers and, therefore, physically, the possession of the Debtors’ records is with the parent, and I expect some provision to be made to make that available.” Transcript of Hearing dated October 26, 2021, pp. 16–17. That is exactly the situation here, and yet GCUK still has not made basic records of the U.S. Debtor available to the Trust.

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The Trust has made progress with the administrative transition of the estate to the Trustee and investigation into potential sources of recovery. However, continued progress is dependent on securing the efficient transfer of the U.S. Debtor's information from GCUK without further delay.

The Trust respectfully requests Your Honor set a LBR 9076-1 Status Conference on February 2, 2022, or sooner if the Court's calendar permits.

Respectfully submitted,

/s/George Angelich

George Angelich

Served by electronic mail:

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